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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

IN RE
POTOMAC PILE DRIVE LLC
DEBTOR

CASE NO 17-34078 KRH

PETER BARRETT, TRUSTEE
Plaintiff

ADV Pro- 19-03070 KRH

V
Robin McCormack,
Shoreline Service & Design LLC
Brad Martin
Potomac Pile Driver LLC
APD3 LLC and
Jacob Lillard
Defendants

**Objection to Finding of Default and
Motion for Continuance**

This day comes Robin McCormack and her corporation Shoreline Service & Design LLC by Counsel Charles H Krumbein and moves this court to not find these two defendants in default for a failure to answer the Movant Trustee's complaint in the above styled action.

Robin McCormack tried unsuccessfully to file an answer in this matter which was struck by the Clerk because counsel was required to file and represent corporations.

This means that even today the attorney for the Movant Trustee knows that these two defendants believe they have defenses to these claims.

Counsel for these two parties needs time to listen to his clients, other witnesses, read documents and prepare a thoughtful answer.

Ms. McCormack, by her counsel is convinced that the trustee's allegation is completely false regarding the concept in fact or at law that Shoreline and Potomac are one entity. She needs time to gather the evidence that would show the assets of Shoreline and that the source of those assets was not Potomac as the trustee has alleged.

Counsel for Ms. McCormack and Shoreline urge this court to not find that any party is in default as there is the possibility that the court could find that there was one entity, which the Defendants alleges is false. . The Trustess' complaint fully imerses the concept of one entity in his complaint and a finding of default and default Judgment could create facts that preclude these two defendants from presenting compelling facts proving that Shoreline and Potomac are separate entities.

Date: January 15, 2020

/S/ Charles H Krumbein
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Certificate of Service

This day the undersigned certifies that a true copy of this Notice of Appearance was sent by CM/ECF and delivered to the Plaintiff's Counsel.
January 15, 2020

/S/ Charles H Krumbein
Charles H Krumbein, Esq.